

**BOIES SCHILLER FLEXNER LLP**

Mark C. Mao (CA Bar No. 236165)  
[mmao@bsflfp.com](mailto:mmao@bsflfp.com)  
Beko Reblitz-Richardson (CA Bar No. 238027)  
[brichardson@bsflfp.com](mailto:brichardson@bsflfp.com)  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 293 6858  
Fax: (415) 999 9695

**SUSMAN GODFREY L.L.P.**

Bill Carmody (pro hac vice)  
[bcarmody@susmangodfrey.com](mailto:bcarmody@susmangodfrey.com)  
Shawn J. Rabin (pro hac vice)  
[srabin@susmangodfrey.com](mailto:srabin@susmangodfrey.com)  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (212) 336-8330

**MORGAN & MORGAN**

John A. Yanchunis (pro hac vice)  
[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)  
Ryan J. McGee (pro hac vice)  
[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel  
listed in signature blocks below*

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

Andrew H. Schapiro (admitted *pro hac vice*)  
[andrewschapiro@quinnemanuel.com](mailto:andrewschapiro@quinnemanuel.com)  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel: (312) 705-7400  
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)  
Viola Trebicka (CA Bar No. 269526)  
[violatrebicka@quinnemanuel.com](mailto:violatrebicka@quinnemanuel.com)  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Tel: (213) 443-3000  
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)  
[dianedoolittle@quinnemanuel.com](mailto:dianedoolittle@quinnemanuel.com)  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel  
listed in signature blocks below*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
PLAINTIFFS TO SUBMIT  
DECLARATION IN SUPPORT OF  
GOOGLE'S ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF  
GOOGLE'S MOTION FOR SUMMARY  
JUDGMENT (DKT. 907)**

The Honorable Judge Yvonne Gonzalez Rogers

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on March 21, 2023, Google filed its Administrative Motion to Seal Portions of Google’s Motion for Summary Judgment (“Motion to Seal”) (Dkt. 907);

WHEREAS, on March 21, 2023, Plaintiffs received unredacted copies of Google’s Motion to Seal and exhibits cited in Dkt. 908;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Plaintiffs, as the Designating Party to portions of Google’s Motion to Seal, to establish that such designated material is sealable, was Tuesday, March 28, 2023;

WHEREAS, Plaintiffs have requested and Google does not oppose an extension of time of 20 days to Monday, April 17, 2023, which Plaintiffs have represented will provide them with sufficient time to submit their declaration in support of the designated materials (Dkt. 907).

NOW THEREFORE, the Parties stipulate to extend the deadline by which Plaintiffs shall submit a Declaration in support of Google’s Motion to Seal (Dkt. 907), to April, 17 2023.

DATED: March 30, 2023

BOIES SCHILLER FLEXNER LLP

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

/s/ Mark C. Mao

/s/ Andrew H. Shapiro

Mark C. Mao (CA Bar No. 236165)  
[mmao@bsflfp.com](mailto:mmao@bsflfp.com)  
Beko Reblitz-Richardson (CA Bar No. 238027)  
[brichardson@bsflfp.com](mailto:brichardson@bsflfp.com)  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 293 6858  
Fax: (415) 999 9695

Andrew H. Schapiro (admitted *pro hac vice*)  
[andrewschapiro@quinnemanuel.com](mailto:andrewschapiro@quinnemanuel.com)  
Teuta Fani (admitted *pro hac vice*)  
[teutafani@quinnemanuel.com](mailto:teutafani@quinnemanuel.com)  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel: (312) 705-7400  
Fax: (312) 705-7401

James W. Lee (*pro hac vice*)  
[jlee@bsflfp.com](mailto:jlee@bsflfp.com)  
Rossana Baeza (*pro hac vice*)  
[rbaeza@bsflfp.com](mailto:rbaeza@bsflfp.com)  
100 SE 2<sup>nd</sup> Street, Suite 2800  
Miami, FL 33130  
Tel: (305) 539-8400  
Fax: (305) 539-1304

Stephen A. Broome (CA Bar No. 314605)  
[sb@quinnemanuel.com](mailto:sb@quinnemanuel.com)  
Viola Trebicka (CA Bar No. 269526)  
[violatrebicka@quinnemanuel.com](mailto:violatrebicka@quinnemanuel.com)  
Crystal Nix-Hines (Bar No. 326971)  
[crystalnixhines@quinnemanuel.com](mailto:crystalnixhines@quinnemanuel.com)  
Alyssa G. Olson (CA Bar No. 305705)  
[alyolson@quinnemanuel.com](mailto:alyolson@quinnemanuel.com)  
865 S. Figueroa Street, 10th Floor

1 Bill Carmody (*pro hac vice*)  
bcarmody@susmangodfrey.com  
2 Shawn J. Rabin (*pro hac vice*)  
srabin@susmangodfrey.com  
3 Steven Shepard (*pro hac vice*)  
sshepard@susmangodfrey.com  
4 Alexander P. Frawley (*pro hac vice*)  
afrawley@susmangodfrey.com  
5 SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
6 New York, NY 10019  
Tel: (212) 336-8330

7  
8 Amanda Bonn (CA Bar No. 270891)  
abonn@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
9 1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
10 Tel: (310) 789-3100

11 John A. Yanchunis (*pro hac vice*)  
jyanchunis@forthepeople.com  
12 Ryan J. McGee (*pro hac vice*)  
rmcgee@forthepeople.com  
13 MORGAN & MORGAN, P.A.  
201 N Franklin Street, 7th Floor  
14 Tampa, FL 33602  
Tel: (813) 223-5505  
15 Fax: (813) 222-4736

16 Michael F. Ram (CA Bar No. 104805)  
mram@forthepeople.com  
17 MORGAN & MORGAN, P.A.  
711 Van Ness Avenue, Suite 500  
18 San Francisco, CA 94102  
Tel: (415) 358-6913

19 *Attorneys for Plaintiffs*

Los Angeles, CA 90017  
Tel: (213) 443-3000  
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
Sara Jenkins (CA Bar No. 230097)  
sarajenkins@quinnemanuel.com  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)  
jomairecrawford@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
1300 I Street NW, Suite 900  
Carl Spilly (admitted *pro hac vice*)  
carlspilly@quinnemanuel.com  
Xi ("Tracy") Gao (CA Bar No. 326266)  
tracygao@quinnemanuel.com  
Washington D.C., 20005  
Tel: (202) 538-8000  
Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)  
jonathantse@quinnemanuel.com  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Tel: (415) 875-6600  
Fax: (415) 875-6700

*Attorneys for Defendant Google LLC*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR PLAINTIFFS TO SUBMIT DECLARATION IN SUPPORT OF GOOGLE'S MOTION TO SEAL (DKT. 907). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: March 30, 2023

By /s/ Mark C. Mao

Mark C. Mao

*Counsel on behalf of Plaintiffs*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Plaintiffs to submit a Declaration in support of Google's Motion to Seal (Dkt. 907) is extended to April 17, 2023.

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge